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DIRECT DIAL: (212) 756-2335
FILE NO.: 861975-0089

DATE: October 14, 2004
Number of Pages: 17
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TRANSMITTAL FORM

(to be used for all correspondence after initial filing)

Application Number	09/458,858
Filing Date	December 10, 1999
First Named Inventor	Jamin F. Pernana
Group Art Unit	2674
Examiner Name	X. Wu
Total Number of Pages in This Submission	Technology Center 2000 861975-0089
Attorney Docket Number	

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861975-0089

ENCLOSURES (check all that apply)

- Fee Transmittal Form
- Fee Attached
- Amendment / Reply
- After Final
- Affidavits/declaration(s)
- Extension of Time Request
- Express Abandonment Request
- Information Disclosure Statement
- Certified Copy of Priority Document(s)
- Response to Missing Parts/ Incomplete Application
- Response to Missing Parts under 37 CFR 1.52 or 1.53

- Assignment Papers (for an Application)
- Drawing(s)
- Licensing-related Papers
- Petition
- Petition to Convert to a Provisional Application
- Power of Attorney, Revocation Change of Correspondence Address
- Terminal Disclaimer
- Request for Refund
- CD, Number of CD(s) _____

- After Allowance Communication to Group
- Appeal Communication to Board of Appeals and Interferences
- Appeal Communication to Group (Appeal Notice, Brief, Reply Brief)
- Proprietary Information
- Status Letter
- Other Enclosure(s) (please identify below):

Remarks

If for any reason Applicant has not paid a sufficient fee to prevent abandonment of this application, the Commissioner is hereby authorized to charge any fee due, or credit any overpayment, to Deposit Account No. 50-0675 - Order No. 861975-0089.

SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm or Individual name	Reine H. Glanz, Reg. No. 46,728 Schulte Roth & Zabel, LLP
Signature	
Date	April 30, 2004

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April 30, 2004

Typed or printed name	Sarah Schlie		
Signature		Date	April 30, 2004

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
BOARD OF PATENT APPEALS AND INTERFERENCES**

Serial No.: 09/458,858
Assignee: NMB, U.S.A., INC.
Title: INTEGRATED USB INPUT DEVICE
Appellant: Jamin Pandana
Filed: December 10, 1999
Examiner: X. Wu
Group Art Unit: 2674
Docket No.: 861975/0089

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REPLY BRIEF (UNDER 37 C.F.R. 1.193)

Appellant replies to the Examiner's Answer dated January 1, 2004.

REPLY TO EXAMINER'S RESPONSE TO ARGUMENT

A. CLAIMS 1, 2 AND 6-13 ARE PATENTABLE OVER POISNER

The USB Controller (32) and AT KB-Controller (30) of Poisner resideS inside the PC, the USB Controller (32) converts all USB signals into PCI Bus, and the AT KB Controller converts the AT/PS2 signals to ISA Bus. Both the ISA or PCI are disposed in the PC and are not in the Keyboard. Furthermore the USB Controller (32) not only to converts the USB signals from Keyboard device, but also converts the USB signals from all other USB devices that will be

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Atty Dkt. No. 861975/0089

plugged into the same USB Ports later after the USB Keyboard Device is unplugged. Other USB devices can be a USB Printer, USB Memory Card as Storage Device, USB Audio Device, USB Camera Device, USB Smart Card Device, USB Finger Print Device, etc. So, the USB Controller (32) is a Generic USB Controller to convert all the USB signals from different USB devices into PCI Bus.

The USB Low Speed MCU (270) in the present invention is different in that it only converts the keyboard key-actuations, mouse movements/clicker actuation and keyboard LED indications definition to communicate with the PC through USB signals. MCU (270) can not and will not be properly worked with the PCI Bus or other Peripheral USB devices like USB Printer, USB Memory Card as Storage Device, USB Audio Device, USB Camera Device, USB Smart Card Device, USB Finger Print Device etc.

Therefore Poisner's USB Controller (32) and the present invention USB Low Speed MCU Controller (270) are different. Poisner USB Controller (32) has to be placed into the PC and can not be outside the PC, it can be inside the PC as an add-on Card on PCI Bus Connectors. If Poisner USB Controller (32) is placed independently outside the PC, then the Poisner USB Controller (32) is an PCI Bus Device to the PC perspective, or we can call them a "USB to PCI" dongle device.

Furthermore, Poisner USB Controller (32) can not be placed into other USB Peripheral Devices, such as USB Keyboard Device, USB Pointing Device, USB Printer, USB Memory Card as Storage Device, USB Audio Device, USB Camera Device, USB Smart Card Device, USB Finger Print Device, etc. If the Poisner USB Controller (32) is put into USB Peripheral Devices such as USB keyboard Device, USB Pointing Device, etc., then these USB Peripheral

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Devices can not be called "USB devices", instead, they are "PCI Bus Device". Figure 1 of Poisner shows that the USB Controller (32) is directly connected to PCI Bus.

B. CLAIMS 3-5 ARE PATENTABLE OVER POSINER IN VIEW OF BRENDZEL

Column 2, lines 54-59 of Brendzel teach that the mouse 16 uses a wired or wireless communication links, for wireless link, infrared (IR) and radio frequency (RF) to communicate with the Network 22 and Computer 10 in the art of telephone communications purposes, which is bi-direction communication between mouse and network, and between mouse and computer.

Column 4, lines 36-43 teach mouse 16 used in a conductor to communicate with Computer 10.

Although Figure 1 seems like a mouse 16 wire pass through the keyboard 14, but there is no teaching states that, with wired or wireless links, that the mouse 16 information will pass through keyboard 14, and have keyboard 14 to transmit the mouse information to Computer 10.

Keyboard 14 is only described once on Col.1 line 62, to describe the scenario of Fig. 1. where keyboard 14 communicates with Computer 10, and Column 1, line 67 – Column 2, line 1 states that the mouse 16 communicates with computer 10 using a conductor.

Brendzel teaches that all wired and wireless communication between Mouse 16 and Computer 10 are directly communicated and do not use the microprocessor of other devices to interface the Mouse 16 information to Computer 10.

One embodiment of the present invention shows the Pointing Device using a wireless method, which is infrared (IR) or radio frequency (RF) to communicate with Keyboard in the art of transmitting the X-Y movements and clicker switch information to the Keyboard. The wireless is one direction of communication, from mouse to keyboard. The Mouse contains a wireless transmitter, and the wireless Receiver is embedded in the keyboard to interface to one

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USB Low Speed MCU (270), which also interfaces with keyboard key matrix input to communicate with PC.

C. CLAIMS 1, 2 AND 6-13 ARE PATENTABLE OVER POISNER IN VIEW OF DUNCAN

Furthermore, Figure 4 show in Duncan has an interface 23 sending motion data generated to Universal Serial Bus Interface 24, and Interface 26 forwards the keystroke data to Universal Serial Bus Interface 24. The present invention is that both keyboard and pointing device raw data are directly interfaced to USB Low Speed MCU (270) without going through other interfaces for data conversion before the Signals/data reach the USB Controller. The present invention discloses that the keyboard and pointing device use one Interface to reduce costs instead of more than one Interface as Duncan claims.

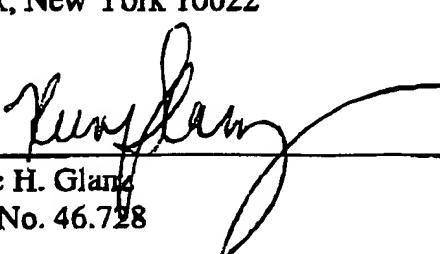
CONCLUSION

For the foregoing reasons, it is respectfully submitted that the Rejections of Claims 1-13 should be reversed.

Respectfully submitted,

SCHULTE ROTH & ZABEL LLP
Attorneys for Appellants
919 Third Avenue
New York, New York 10022

By:


Reine H. Glantz
Reg. No. 46.728

Dated: April 30, 2004
New York, New York

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
BOARD OF PATENT APPEALS AND INTERFERENCES**

Serial No.: 09/458,858
Assignee: MINEBEA CO., LTD.
Title: INTEGRATED USB INPUT DEVICE
Appellant: Jamin Pandana
Filed: December 10, 1999
Examiner: X. Wu
Group Art Unit: 2674
Docket No.: 861975/0089
Appeal No. 2004-1422

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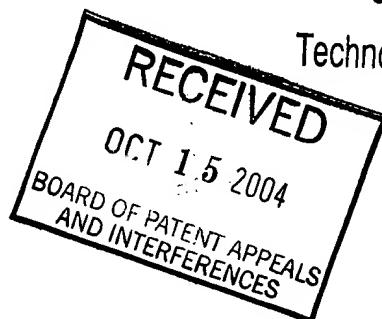
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COMMUNICATION

Appellant received a Remand to Examiner dated September 27, 2004 stating that there is no record that the Reply Brief filed May 3, 2004 was considered or acted on. The Remand then states that the Reply Brief was filed May 3, 2003 with a certificate of mailing dated April 30, 2004 and that the Reply should have been filed no later than March 30, 2004.

On March 30, 2004, two One-Month Extensions of Time were filed with the Board of Patent Appeals and Interferences: (i) one extension was for filing a Request for Oral Hearing which Appellant decided not to file; and (ii) the second extension was for filing a Response to Examiner's Answer mailed January 30, 2004 thereby extending the reply period from March 30,

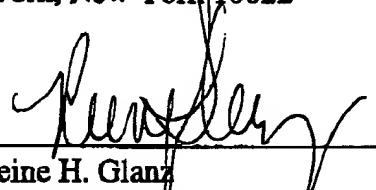
FROM 12125935955 SCHULTE ROTH & ZABEL
Serial No.: 09/458,858
Atty.Dkt. No. 861975/0089

(THU) 10.14' 04 12:32/ST. 12:31/NO. 4261743862 P 3

2004 to April 30, 2004. Accordingly, Appellant's Reply Brief was timely filed on April 30, 2004. Attached are copies of the two One-Month Extensions of Time along with copies of the postcard and checks (each for \$110). Also attached is a copy of the Reply Brief dated April 30, 2004 along with a copy of the postcard and a copy of a check in the amount of \$330.

Respectfully submitted,

SCHULTE ROTH & ZABEL LLP
Attorneys for Appellant
919 Third Avenue
New York, New York 10022

By: 

Reine H. Gland
Reg. No. 46,728

Dated: October 14, 2004
New York, New York

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ATTORNEY/ASSISTANT: Glanz/schiles POSTCARD (TO BE FILED WITH A RESPONSE)
 PATENT APPLICATION FOR: Integrated USB Input Device DOCKET NO.: 851576-0089
 INVENTORS: Jamin Pandana
 SERIAL NO.: 08/458,858

FILING DATE: December 10, 1999 DATE MAILED: March 30, 2004

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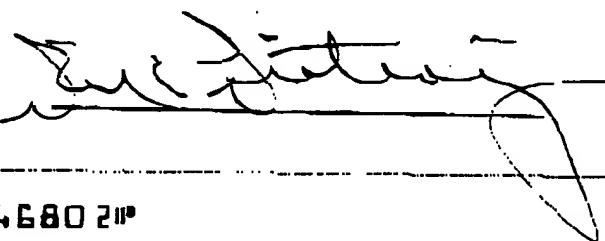
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
BOARD OF PATENT APPEALS AND INTERFERENCES**

Serial No.: 09/458,858
Assignee: MINEBEA CO., LTD.
Title: INTEGRATED USB INPUT DEVICE
Applicant: Jamin Pandana
Filed: December 10, 1999
Examiner: X. Wu
Group Art Unit: 2674
Docket No.: 861975/0089

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PETITION FOR A ONE-MONTH EXTENSION OF TIME

Sir:

Applicants hereby request a one-month extension of time in connection with the above-identified application for filing a Request for Oral Hearing. A Request for Oral Hearing was originally due March 30, 2004, and the time for the request is hereby extended to April 30, 2004. A check is enclosed for \$110.00 to cover the one-month extension of time fee for a large entity.

The extension is requested due to the fact that the Examiner's Answer was mailed to Applicant's previous firm, Amster Rothstein & Ebenstein, thereby delaying delivery to Applicant's present firm, Schulte Roth & Zabel, by one month. As stated under 37 C.F.R. Rule 1.136(b), the extension of time is hereby requested for sufficient cause and for a reasonable time.

Authorization is given hereby to charge any deficiency or credit any overpayment in the enclosed fee, or charge any additional extension of time fees necessary to preserve the pendency of the subject application, to Deposit Account No. 500675, Order No. 861975-0089. Additionally, any additional extensions of time required to maintain the pendency of the subject application are hereby respectfully requested.

Respectfully submitted,

SCHULTE ROTH & ZABEL LLP
Attorneys for Applicants
919 Third Avenue
New York, New York 10022
(212) 756-2000

By: Reine H. Glanz
Reine H. Glanz
Reg. No. 46,728

Dated: March 30, 2004
New York, New York

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
BOARD OF PATENT APPEALS AND INTERFERENCES**

Serial No.: 09/458,858
Assignee: MINEBEA CO., LTD.
Title: INTEGRATED USB INPUT DEVICE
Applicant: Jamin Pandana
Filed: December 10, 1999
Examiner: X. Wu
Group Art Unit: 2674
Docket No.: 861975/0089

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PETITION FOR A ONE-MONTH EXTENSION OF TIME

Sir:

Applicants hereby request a one-month extension of time in connection with the above-identified application for filing a Response to Examiner's Answer mailed January 30, 2004. A response to the Examiner's Answer was originally due March 30, 2004, and the time for response is hereby extended to April 30, 2004. A check is enclosed for \$110.00 to cover the one-month extension of time fee for a large entity.

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Respectfully submitted,

SCHULTE ROTH & ZABEL LLP
Attorneys for Applicants
919 Third Avenue
New York, New York 10022
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By: Reine Glanz
Reine H. Glanz
Reg. No. 46,728

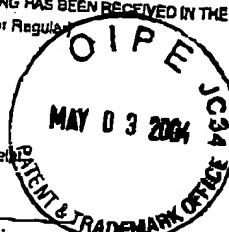
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ATTORNEY/ASSISTANT:	Glanz/Schlies	POSTCARD (TO BE FILED WITH A RESPONSE)
PATENT APPLICATION FOR:	Integrated USB Input Device	Docket No.: 861975-0089
INVENTORS:	Jamin Pandana	
SERIAL NO.:	09/458,858	
		FILING DATE: December 10, 1999
		DATE MAILED: April 30, 2004
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